

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EDWARD R. FLYNN, GENE DAISEY,)	
DOUGLAS J. ABBOTT, PERCY CHAPMAN,)	CIVIL ACTION
and JANENE CHAPMAN, individually and on)	
behalf of all others similarly situated)	CLASS ACTION
)	
Plaintiffs,)	Case No. 2:17-cv-04806-WB
)	
v.)	
)	
MANUFACTURERS AND TRADERS TRUST)	
COMPANY a/k/a M&T BANK,)	
)	
Defendant.)	
_____)	

JOINT MOTION TO STAY PROCEEDINGS

AND NOW COME Plaintiffs, Edward R. Flynn, Douglas J. Abbott, Gene E. Daisey, Percy Chapman, and Janene Chapman (collectively, the “Plaintiffs”) and Defendant, Manufacturers and Traders Trust Company a/k/a M&T Bank (“M&T”, and together with Plaintiffs, the “Parties”), by and through their undersigned counsel, hereby submit this Joint Motion to Stay Proceedings.

After extensive negotiations with the Honorable Magistrate Judge Richard A. Lloret, the Parties have agreed to a settlement in principle. The parties, therefore, respectfully request that the Court stay this matter for sixty (60) days and vacate all deadlines to allow the parties to draft a settlement agreement and file a Motion for Preliminary Approval. A proposed order is attached.

Respectfully submitted,

By: /s/Richard Shenkan
Richard Shenkan, Esq.
SHENKAN INJURY LAWYERS
Co-Counsel for Plaintiffs

By: /s/ James P. Berg
James P. Berg, Esq.
PARKER IBRAHIM & BERG LLP
Co-Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion has been sent to all counsel of record through the Court's ECF system.

SHENKAN INJURY LAWYERS, LLC.

/s/ Richard Shenkan

Richard Shenkan

Counsel for Plaintiffs

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MANUFACTURERS AND TRADERS TRUST)	
COMPANY a/k/a M&T BANK,)	
)	
Defendant.)	
_____)	

ORDER

AND NOW, this ____ day of _____, 2022, upon consideration of the Parties' Joint Motion to Stay Proceedings, it is hereby ORDERED that the motion is GRANTED. All deadlines are vacated and the matter is stayed for 60 days. The case shall be transferred to the Civil Suspense File. The Clerk shall mark this case closed for statistical purposes.

IT IS SO ORDERED.

BY THE COURT:

HON. WENDY BEETLESTONE, U.S.D.J.